

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JENKENS & GILCHRIST PARKER  
CHAPIN LLP and  
JENKENS & GILCHRIST,  
A PROFESSIONAL CORPORATION,

06 Civ. 9890 (DAB)

Plaintiffs,

-against-

PC NEWCO LLC,

Defendant.

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
*PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, the undersigned member in good standing of this Court hereby move for an Order allowing the admission *pro hac vice* of the following member in good standing of the Bar of the State of Texas:

Applicant's Name: V. Elizabeth Kellow  
Firm Name: Marshall & Kellow, LLP  
Address: 4315 W Lovers Lane  
Dallas, TX 75209-2803  
Phone Number: (214) 956-0200  
Fax Number: (214) 956-0203  
Email: ekellow@MKTexasLaw.com

There are no pending disciplinary proceedings against Ms. Kellow in any State or Federal court.

Dated: January 3, 2007  
New York, New York


601447 \$25  
1-4-07  
MK

FILED  
JAN 4 2007  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Respectfully submitted,

KESTENBAUM, DANNENBERG & KLEIN, LLP  
Attorneys for Plaintiffs

By:



Jeffrey C. Dannenberg (JD-3270)

104 West 40th Street (20th Floor)  
New York, NY 10018  
(212) 486-3370  
Fax: (212) 486-3371

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
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CHAPIN LLP and  
JENKENS & GILCHRIST,  
A PROFESSIONAL CORPORATION,

06 Civ. 9890 (DAB)

Plaintiffs,

-against-

PC NEWCO LLC,

Defendant.

**AFFIDAVIT IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

-----X  
STATE OF NEW YORK     )  
                                  ) ss:  
COUNTY OF NEW YORK )

**JEFFREY C. DANNENBERG**, being duly sworn, hereby deposes and says as follows:

1. I am a member of the firm of Kestenbaum, Dannenberg & Klein, LLP, attorneys for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this affidavit based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit **V. Elizabeth Kellow** as counsel *pro hac vice* to represent Plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1983. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am in good standing with this Court.

3. I have known V. Elizabeth Kellow since October of 2006.

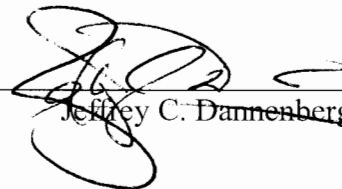
4. Ms. Kellow is a partner with Marshall & Kellow, LLP in Dallas, Texas.

5. I have found Ms. Kellow to be a skilled attorney and a person of integrity. Annexed hereto as Exhibit A is a Certificate of Good Standing for Ms. Kellow, issued by the State Bar of Texas. In addition, Ms. Kellow is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

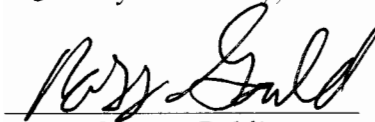
6. Accordingly, I am pleased to move the admission of **V. Elizabeth Kellow**, *pro hac vice*.

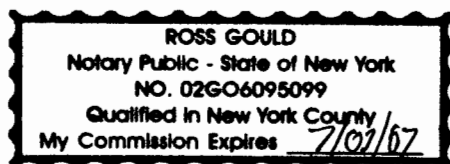
7. I respectfully submit herewith a proposed order granting the admission of **V. Elizabeth Kellow**, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit **V. Elizabeth Kellow**, *pro hac vice*, to represent Plaintiffs in the above-captioned matter, be granted.

  
\_\_\_\_\_  
Jeffrey C. Dannenberg (JD-3270)

Sworn to before me this  
3<sup>rd</sup> day of January, 2007

  
\_\_\_\_\_  
Notary Public



# STATE BAR OF TEXAS



## Office of The Chief Disciplinary Counsel

December 06, 2006

RE: **Ms. Veronique Elizabeth Kellow**  
State Bar Number - **11213750**

To Whom it May Concern:

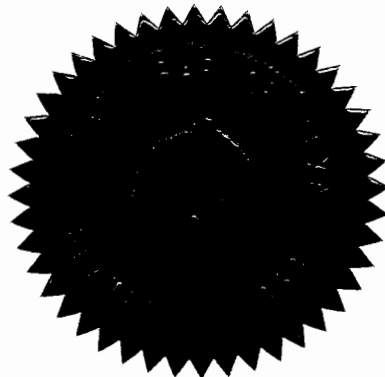
This is to certify that Ms. Veronique Elizabeth Kellow was licensed to practice law in Texas on November 02, 1990 and is an active member in good standing with the State Bar of Texas.

Good Standing means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

No disciplinary action involving professional misconduct has been taken against the attorney's law license. This certification expires 30 days from this date, unless sooner revoked or rendered invalid by operation of rule or law.

John A. Neal  
Chief Disciplinary Counsel

JN/dh



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHAPIN LLP and  
JENKENS & GILCHRIST,  
A PROFESSIONAL CORPORATION,

06 Civ. 9890 (DAB)

Plaintiffs,

-against-

PC NEWCO LLC,

Defendant.

**ORDER GRANTING  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

-----X  
It is hereby ORDERED that the following applicant is admitted to practice *pro hac vice* as counsel for Plaintiffs in the above-captioned case in the United States District Court for the Southern District of New York:

Applicant's Name:	V. Elizabeth Kellow
Firm Name:	Marshall & Kellow, LLP
Address:	4315 W Lovers Lane Dallas, TX 75209-2803
Phone Number:	(214) 956-0200
Fax Number:	(214) 956-0203
Email:	ekellow@MKTexasLaw.com

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Because this case has been assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: January \_\_\_\_, 2007

\_\_\_\_\_  
United States District Judge

